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*Attorneys for East Penn Manufacturing Co.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----  
In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.<sup>1</sup>

X : Chapter 11  
: Case No. 18-23538  
: (Jointly Administered)  
:  
:  
:  
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**NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE that **STEVENS & LEE, P.C.** hereby appears as Counsel on behalf of East Penn Manufacturing Co. in the above-captioned Bankruptcy proceeding, pursuant

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innnovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

to 11 U.S.C. § 1109, and Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, and demands service of all notices and papers herein upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind, including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property, or its estate. The undersigned requests that its name be added to the mailing list in the above-captioned case.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Demand for Service of Papers* (the “**Notice**”) nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of: (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge; (ii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (v) an election of remedy; or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully submitted,

Dated: New York, New York  
October 24, 2018

**STEVENS & LEE, P.C.**

By: /s/ Constantine D. Pourakis

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**CERTIFICATE OF SERVICE**

I, Constantine D. Pourakis, a member of the Bar of the State of New York, state that on October 24, 2018, I cause a true and correct copy of the foregoing ENTRY OF APPEARANCE to be electronically filed through the Court's CM/ECF system. Notice of this filing will be sent to all parties on the Court's Electronic Mail Notice List by operation of the Court's CM/ECF system, including Debtors' counsel.

By: /s/ Constantine D. Pourakis  
Constantine D. Pourakis